

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA)	
)	
v.)	3:12-CR-137-REP
)	
KOLON INDUSTRIES, INC.,)	
Including and through its)	
successors "Kolon Industries, Inc.")	
and "Kolon Corporation")	
JONG-HYUN CHOI,)	
IN-SIK HAN,)	
JU-WAN KIM,)	
KYEONG-HWAN RHO,)	
YOUNG-SOO SEO,)	
)	
Defendants.)	

**RESPONSE OF THE UNITED STATES TO KOLON CORPORATION'S
MOTION FOR LEAVE TO ENTER A LIMITED AND SPECIAL APPEARANCE AND
TO RESPOND TO THE GOVERNMENT'S PURPORTED SERVICE OF PROCESS**

In light of this Court's prior order granting special appearances to the "new" Kolon Industries, Inc. and to Kolon Corporation (hereinafter "the successor defendants"), the government does not oppose the instant motion of Kolon Corporation to specially appear and respond to the notice of additional service filed by the government.¹ The government also does not oppose the briefing schedule proposed by Kolon Corporation. In the interests of efficiency, and to avoid repetition of arguments that have already been fully developed before this Court, the government submits that the briefing allowed by the Court be limited to novel issues, if any,

¹ As noted in earlier briefing, Dkt. No. 63 at 7-8, the government is concerned about conflict of interest issues arising from the fact that the same attorneys are purporting to represent both successor defendants. Since this Court has already permitted those attorneys to specially appear on behalf of both successor defendants, the government will re-raise its conflict objections if and when the successor defendants are ordered to make a general appearance.

presented by the additional service of process upon Kolon Corporation. If Kolon Corporation wishes to re-raise issues or arguments that have already been raised by the successor defendants with respect to the service of process that occurred in May of 2013, it should simply incorporate them by reference.

Respectfully submitted,

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Dated: January 10, 2014

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of January, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of filing (NEF) to the following:

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